

From: Near Buzzard Point Residents Advisory Committee (NeRAC)

To: DC Zoning Commission

Re: ZC Case No. 16-02 – D.C. United Stadium

Date: December 14, 2016

Dear Zoning Commission,

District of Columbia Zoning Commission

441 4th Street NW, Suite 200S

Washington, DC 20001

Re: ZC Case No. 16-02 – D.C. United Stadium

The Near Buzzard Point Residents Advisory Committee also known as NeRAC is a community based organization that includes residents and allies of the neighborhood adjacent to the Buzzard Point historic industrial zone. Community residents live fence line to the industry and planned development for the Buzzard Point Neighborhood. NeRAC members are deeply concerned about the potential impact of the soccer stadium site remediation, construction and long-term impact on the community. While it is exciting to think of a new soccer stadium for our Major League team it should not be at the expense of our community.

The DC Comprehensive Plan Land Use (Comprehensive Plan Ch. 3 pg. 3-8) goals are stated as:

Ensure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents, institutions, and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries.

The DC United Soccer Stadium PUD does not protect the health, safety and welfare of District residents.

Health:

We as NeRAC members do not feel that our best interest is being showcased in this Planned Unit Development. Many of us already face a myriad of issues including the current air pollution from the concrete and aggregate yards, the former salvage yard, and the South Capitol Street Bridge. Many of our residents have lived through the first urban development of Southwest in the 1950's and the development of Nationals Baseball stadium that was also constructed on toxic land. Both development plans displaced community residents and businesses and

impacted the health of residents. Residents in Near Southeast and Southwest have documented health issues such as asthma, respiratory illness and cancer.

There is no best management plan or documented strategy for addressing the health and community concerns addressed in the Buzzard Point Community Health and Safety Study. The remediation and construction process of the site development will increase diesel vehicle traffic. Remediation of the site can potentially expose community residents and site workers to over 8 different toxic contaminants found on the grounds of the site during the voluntary clean-up process led by Haley and Aldrich. Exposure can occur from release of the contaminants in the air, soil and/or vapor intrusion. Introducing additional/increased pollutants to the community will exacerbate the health concerns of already vulnerable residents.

Excavation and construction of the site will also disrupt the natural dwelling spaces of wildlife and vermin in the area forcing them closer into the residential area. Near Buzzard Point already has a documented issue with rodent control and we are fearful of rodents transporting toxins into our homes from the remediation process. A well thought out and articulated plan must be put in place to reduce rodent migration from the site to the Near Buzzard Point community.

It should be noted that the site is located in an area with a number of other co-pollutants including concrete and aggregate yards and the South Capitol Street Bridge (ZC-16-02 ex.45A). Data derived from the Environmental Protection Agency EJ Screen showcases that census tract 0064 (CT64), the area closest to the PUD, is in the 94 percentile in EPA region 3 for Diesel Particulate Matter, 93 percentile for Air Toxics Cancer Risk and 93 percentile for Particulate matter 2.5. These indicators showcase the present day environmental vulnerability for NERAC members who live in CT64.

A documented strategy for implementing community safeguards and long-term protections must be put in place before remediation and construction. We are requesting community health safeguards for the surrounding community including Air Monitors in the Near Buzzard Point Community that recognize not only P.M. 10 but also P.M. 2.5 and Volatile Organic Compounds (V.O.C.), High Efficiency Particulate Air (HEPA) Purifiers, HEPA Vacuums and dust mats to reduce exposure to contaminated fugitive dust and particulate matter.

A copy of the EJscreen report has been included as a supplement to this testimony and can be viewed online at <https://ejscreen.epa.gov> .

Safety:

The PUD will increase traffic to an already congested area. The ANC6d final report on the PUD (ZC-Case 16-02 ex. 45) states some of the community concerns for the neighborhood. One concern is that congestion will make it more difficult for emergency vehicles to travel through the community on game days. This is also of concern during times of natural disasters or domestic terror threats that are of even higher concern for Buzzard Point- a waterfront community, less than 2 miles from the United States Capitol. Increase in traffic to the stadium

through residential communities is a hazard to pedestrians and bikers. Bike trails and parking to the site are inadequate and will not account for the DC United stated push to increase bike travel to the stadium.

Increase in construction vehicles travelling down Potomac Avenue may also encourage existing industries and construction projects like the Waterfront Substation project to disregard specified transit routes and drive through residential communities. Residents already see large diesel construction and concrete mixing vehicles travelling down residential streets putting children, elderly and less mobile residents at risk.

Welfare:

The PUD states that Half St SW is the “Transportation Spine of Buzzard Point”. The community is concerned accommodating traffic for the stadium and the overarching Buzzard Point Framework and Implementation Plan will lead to the seizure of housing on Half Street SW through eminent domain. The concern of displacement is a community welfare concern. The Buzzard Point Community Health and Safety Study showcases that Census Tract 0064 (CT64), the closest residential community to the site that also includes portions of Half St. SW, is the most economically disadvantaged community in the 20024 zipcode. CT64 has a significant number of low to moderate income residents who would be disproportionately impacted by displacement caused by the development of this PUD. District Department of Transportation and the Office of Planning have not adequately addressed how the stated PUD will protect the welfare of economically vulnerable community residents or property owners if displacement should occur due to the stadium development. There is also no stated strategy for avoiding displacement, while also making accommodations for increased traffic.

Promises of employment for the community due to the development of the stadium are mainly low-wage, seasonal jobs that will not support residents when this PUD will usher in a wave of development that will increase rent prices, property taxes and cost of living in the neighborhood.

NeRAC is opposed to the current PUD for the DC United Soccer Stadium due to the concerns stated in our testimony and listed in the ANC6d final report. NeRAC requests that these issues be adequately addressed before the DC United Stadium PUD is approved.



Location: User-specified polygonal location
 Ring (buffer): 0-mile radius
 Description:

Summary of ACS Estimates		2010 - 2014
Population		11,334
Population Density (per sq. mile)		6,618
Minority Population		6,752
% Minority		60%
Households		6,713
Housing Units		7,622
Housing Units Built Before 1950		557
Per Capita Income		50,637
Land Area (sq. miles) (Source: SF1)		1.71
% Land Area		100%
Water Area (sq. miles) (Source: SF1)		0.00
% Water Area		0%

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	11,334	100%	354
Population Reporting One Race	10,985	97%	879
White	4,915	43%	315
Black	5,322	47%	322
American Indian	69	1%	38
Asian	571	5%	135
Pacific Islander	0	0%	12
Some Other Race	108	1%	57
Population Reporting Two or More Races	349	3%	97
Total Hispanic Population	647	6%	88
Total Non-Hispanic Population	10,687		
White Alone	4,582	40%	315
Black Alone	5,238	46%	324
American Indian Alone	49	0%	38
Non-Hispanic Asian Alone	571	5%	135
Pacific Islander Alone	0	0%	12
Other Race Alone	0	0%	12
Two or More Races Alone	247	2%	60
Population by Sex			
Male	5,172	46%	301
Female	6,162	54%	260
Population by Age			
Age 0-4	392	3%	123
Age 0-17	1,049	9%	124
Age 18+	10,285	91%	342
Age 65+	1,743	15%	129

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available.
Source: U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.



Location: User-specified polygonal location
 Ring (buffer): 0-mile radius
 Description:

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	9,287	100%	317
Less than 9th Grade	246	3%	66
9th - 12th Grade, No Diploma	394	4%	84
High School Graduate	997	11%	135
Some College, No Degree	1,369	15%	110
Associate Degree	256	3%	70
Bachelor's Degree or more	6,281	68%	292
Population Age 5+ Years by Ability to Speak English			
Total	10,942	100%	346
Speak only English	9,229	84%	319
Non-English at Home ¹⁺²⁺³⁺⁴	1,713	16%	230
¹ Speak English "very well"	1,513	14%	226
² Speak English "well"	153	1%	50
³ Speak English "not well"	47	0%	42
⁴ Speak English "not at all"	0	0%	12
³⁺⁴ Speak English "less than well"	47	0%	42
²⁺³⁺⁴ Speak English "less than very well"	200	2%	50
Linguistically Isolated Households*			
Total	80	100%	46
Speak Spanish	48	60%	44
Speak Other Indo-European Languages	6	8%	12
Speak Asian-Pacific Island Languages	26	32%	22
Speak Other Languages	0	0%	12
Households by Household Income			
Household Income Base	6,713	100%	170
< \$15,000	867	13%	84
\$15,000 - \$25,000	444	7%	101
\$25,000 - \$50,000	1,215	18%	152
\$50,000 - \$75,000	885	13%	120
\$75,000 +	3,302	49%	205
Occupied Housing Units by Tenure			
Total	6,713	100%	170
Owner Occupied	2,776	41%	175
Renter Occupied	3,937	59%	190
Employed Population Age 16+ Years			
Total	10,337	100%	337
In Labor Force	7,646	74%	336
Civilian Unemployed in Labor Force	604	6%	78
Not In Labor Force	2,691	26%	161

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

*Households in which no one 14 and over speaks English "very well" or speaks English only.



Location: User-specified polygonal location

Ring (buffer): 0-mile radius

Description:

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	10,942	100%	346
English	N/A	N/A	N/A
Spanish	N/A	N/A	N/A
French	N/A	N/A	N/A
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	N/A	N/A	N/A
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	N/A	N/A	N/A
Chinese	N/A	N/A	N/A
Japanese	N/A	N/A	N/A
Korean	N/A	N/A	N/A
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	N/A	N/A	N/A
Other Asian	N/A	N/A	N/A
Tagalog	N/A	N/A	N/A
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	N/A	N/A	N/A
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	N/A	N/A	N/A
Total Non-English	N/A	N/A	N/A

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

*Population by Language Spoken at Home is available at the census tract summary level and up.



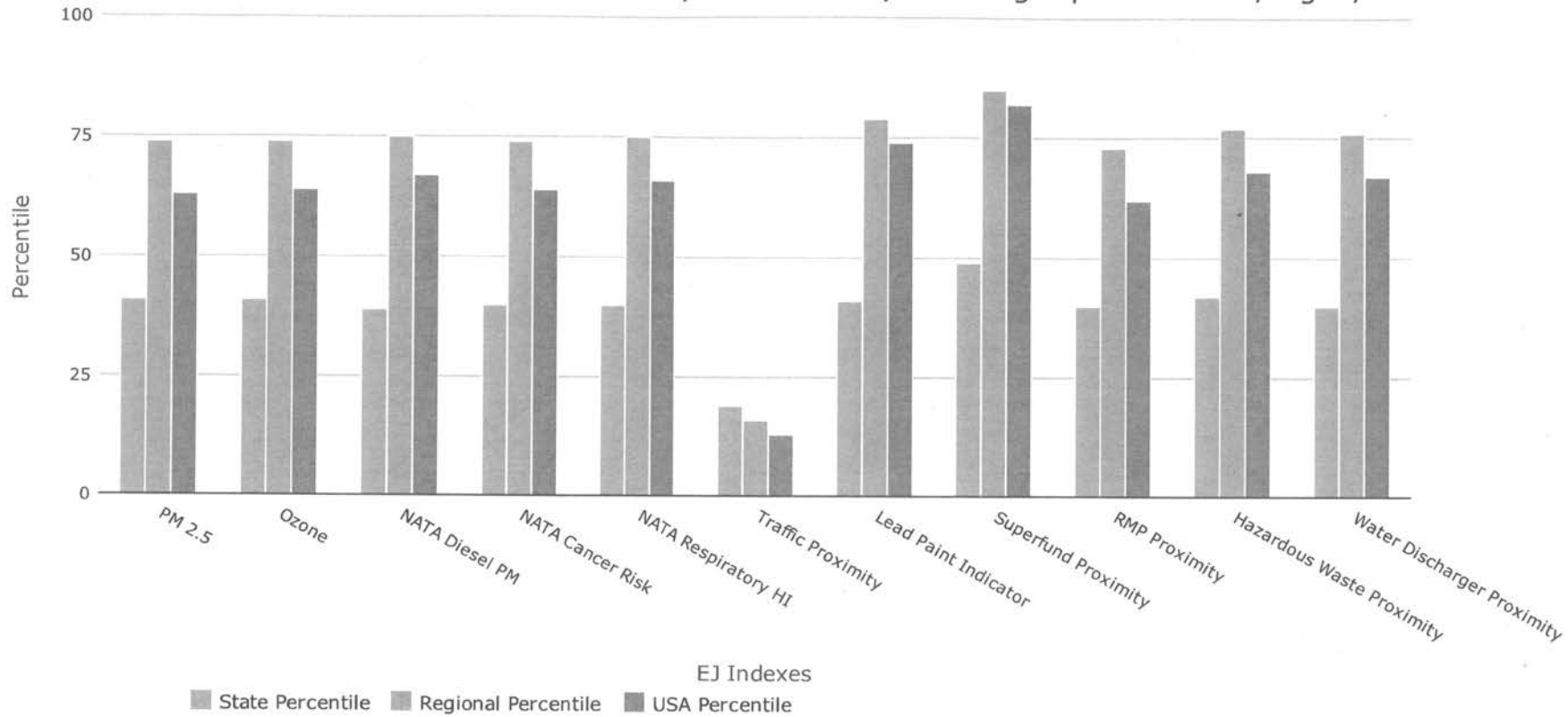
EJSCREEN Report (Version 2016)
the User Specified Area
DISTRICT OF COLUMBIA, EPA Region 3
Approximate Population: 11,334
Input Area (sq. miles): 2.33



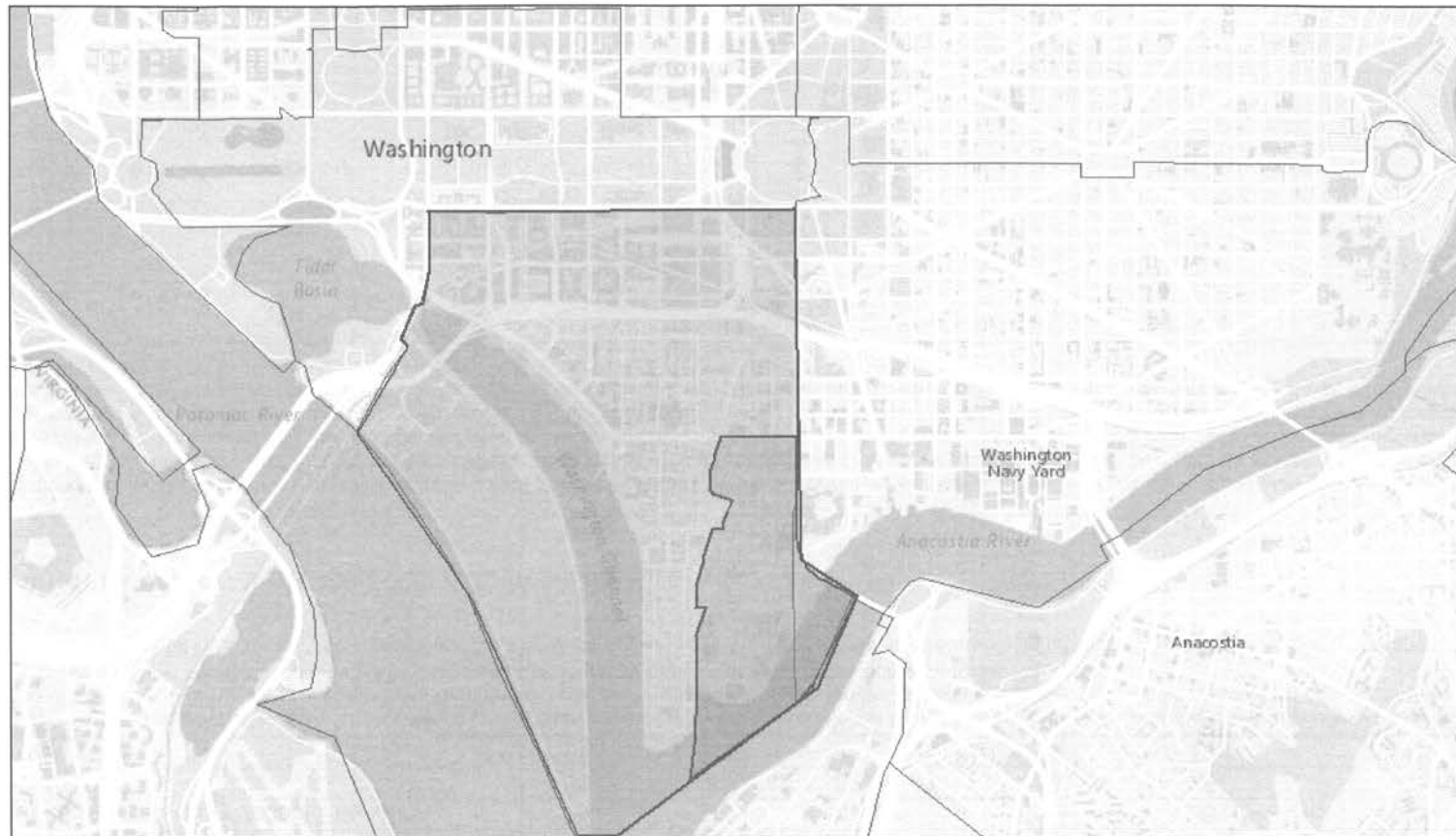
(The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	41	74	63
EJ Index for Ozone	41	74	64
EJ Index for NATA* Diesel PM	39	75	67
EJ Index for NATA* Air Toxics Cancer Risk	40	74	64
EJ Index for NATA* Respiratory Hazard Index	40	75	66
EJ Index for Traffic Proximity and Volume	19	16	13
EJ Index for Lead Paint Indicator	41	79	74
EJ Index for Superfund Proximity	49	85	82
EJ Index for RMP Proximity	40	73	62
EJ Index for Hazardous Waste Proximity ⁺	42	77	68
EJ Index for Water Discharger Proximity	40	76	67

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US

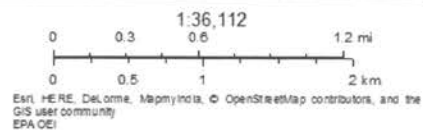


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



December 9, 2016

- Digitized Polygon
- Known Geography
- ZIP Codes



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	0

Selected Variables	Value	State Average	Percentile in State	EPA Region Average	Percentile in EPA Region	USA Average	Percentile in USA
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Environmental Indicators

Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.94	10	26	9.84	48	9.32	61
Ozone (ppb)	52.8	52.7	64	49.8	92	47.4	79
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	2.36	2.5	57	0.918	95-100th	0.937	95-100th
NATA* Air Toxics Cancer Risk (risk per MM)	55	60	34	42	80-90th	40	90-95th
NATA* Respiratory Hazard Index	3.5	3.4	67	1.8	95-100th	1.8	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	1700	460	94	350	95	590	92
Lead Paint Indicator (% pre-1960s housing)	0.23	0.63	9	0.37	42	0.3	53
Superfund Proximity (site count/km distance)	0.4	0.24	87	0.15	92	0.13	93
RMP Proximity (facility count/km distance)	0.11	0.16	38	0.35	37	0.43	31
Hazardous Waste Proximity (facility count/km distance) [†]	0.17	0.17	83	0.12	81	0.11	85
Water Discharger Proximity (count/km)	0.38	0.48	57	0.37	74	0.31	79

Demographic Indicators

Demographic Index	42%	48%	42	30%	76	36%	65
Minority Population	60%	65%	42	31%	80	37%	74
Low Income Population	25%	32%	42	29%	48	35%	38
Linguistically Isolated Population	1%	3%	49	2%	61	5%	50
Population with Less Than High School Education	7%	11%	41	12%	38	14%	35
Population under Age 5	3%	6%	32	6%	26	6%	23
Population over Age 64	15%	11%	77	15%	59	14%	65

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

[†]The hazardous waste environmental indicator and the corresponding EJ index will appear as N/A if there are no hazardous waste facilities within 50 km of a selected location.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.